UNITED STATES DISTRICT COURT EASTERN DISTRICT OF TENNESSEE GREENEVILLE

KATERI LYNNE DAHL,]	
]	
Plaintiff,]	
]	
v.]	No. 2:22-cv-00072-KAC-JEM
]	
CHIEF KARL TURNER, et al.,]	
]	
Defendants.]	

JOINT STATUS REPORT

Pursuant to this Court's directive to counsel to meet and confer [Doc. 103, PageID #: 3646] and [Doc. 104, PageID #:3652], the parties would provide the following *Status Report*:

- 1. Involved counsel engaged in a telephone conference meet and confer on March 21, 2024.
- 2. Counsel reached an agreement that the full Daigle deposition submitted under seal on February 6, 2024 [Doc. 84-24, Ex.49] should be withdrawn or otherwise electronically deleted in accord with Local Rule 5.3 related to the filing of only those pages of depositions germane to what is needed for the Court's consideration.
- 3. Within the timeline established by the Court to determine if an agreement could be reached as to the sealing of the cited pages to the Daigle deposition, counsel was unable to reach an agreement as to the proper classification of the now limited number of Daigle deposition pages. However, it was agreed the deposition pages at issue are less than twenty (20) pages and are those pages cited in *Plaintiff's Omnibus Opposition Brief* to Each Defendant's Motion for Summary Judgment [Doc. 82, PageID #: 2092] and *Plaintiff's Motion to Publicly File the Daigle Deposition*

Transcript and Related Exhibits with Certain Redactions [Doc. 72, Page ID# 1595].

- 4. With the indulgence and approval of the Court, counsel would propose that the limited number of Daigle deposition pages at this time be filed under seal so as not to delay the Court's ability to consider the Defendants' pending dispositive motions and Plaintiff's *Reply*.
- 5. It is the intention and expectation of counsel to have additional meet and confer conference calls in an effort to timely produce and file a *Proposed Joint Pre-Trial Order* to comply with the Court's *Scheduling Order* [Doc. 24, PageID #: 240]. Such conference calls will provide the opportunity for counsel to the Defendants to consider Plaintiff's continued position that the now reduced number of Daigle deposition pages cited in Dahl's pleadings should be filed in the public record or otherwise identify why those Daigle deposition pages should remain sealed with a designation of "Confidential" pursuant to the *Joint Protective Order* [Doc. 26, PageID #: 254].

Respectfully submitted,

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